1 LAW OFFICES OF PANOS LAGOS Panos Lagos, Esq. / SBN 61821 5032 Woodminster Lane Oakland, CA 94602 3 (510)530-4078 (510)530-4725/FAX 4 panoslagos@aol.com 5 Attorney for Plaintiffs, FREDERICK JACKSON, ASHLEY NICOLE JACKSON, 6 BRIANA FREDRANIQUE ANNETTE JACKSON, and SHAWNA YVETTE MARTIN 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 FREDERICK JACKSON, ASHLEY NICOLE Case No.: C 09-01016 WHA JACKSON, and BRIANA FREDRANIQUE 11 ANNETTE JACKSON, STIPULATION AND PROPOSED 12 Plaintiffs, ORDER TO CONTINUE NOVEMBER 15, 2010 DEADLINE 13 TO SUBMIT ATTORNEYS FEES DOCUMENTATION [LOCAL 14 GERALD VINCENT LOMBARDI, individually and as an officer of the City of Pittsburg Police Department (Badge # 275), CORY LEE SMITH, **RULE 6-3**] 15 individually and as an officer of the City of 16 Pittsburg Police Department (Badge # 285), SANKARA REDDY DUMPA, individually and as an officer of the City of Pittsburg Police 17 Department (Badge # 291), WILLIAM BLAKE 18 HATCHER, individually and as an officer of the City of Pittsburg Police Department (Badge # 274), 19 Defendants. 20 21 IT IS HEREBY STIPULATED by and between Plaintiffs' attorney, Panos Lagos, Esq. of 22 the Law Offices of Panos Lagos and Defendants' attorney, Owen T. Rooney, Esq. of Edrington, 23 Schirmer & Murphy, that the November 15, 2010 deadline to submit attorneys fees 24 documentation pursuant to this Court's November 5, 2010 Order be extended to and including 25 November 29, 2010 at Noon. The reasons for such extension are as follows: 26 1. Plaintiffs' attorney, Panos Lagos, has been without his secretary, Alicia Wilson, from 27 November 5, 2010 to the present apparently due to a severe cold or flu. At Mr. 28 Lagos' insistence, she has prepared this Stipulation. Mr. Lagos is totally reliant upon STIPULATION FOR EXTENSION OF TIME -1-

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Ms. Wilson for the practical aspects of complying with and navigating through this Court's electronic filing system and word processing of pleadings, does not know how to do any of that himself, has no other support staff, and is, therefore, unable to meet the Court's November 15, 2010 deadline.

- 2. Appended hereto as Exhibit A is a true and correct copy of Mr. Lagos' secretary's email message dated November 9, 2010 confirming her debilitating but, hopefully, temporary illness as well as her effort to meet the November 15, 2010 deadline by, at my insistence, transcribing dictation from home on November 8, 2010.
- 3. Mr. Lagos is further unable to meet the Court's November 15, 2010 deadline since he and the other attorneys who have worked on this case have been diligent, albeit not yet successful, in meeting the Court's portion of the November 5, 2010 Order requesting that we delete time related to the unsuccessful Plaintiffs.
- 4. In addition, one of the attorneys who will be submitting her time to this Court has been assigned a courtroom for a jury trial in Alameda County expected to go through December 6, 2010.

It is further stipulated that this Stipulation may be executed in counterpart and the separate signature treated as one document through incorporation by reference and that any facsimile signatures of counsel on the Stipulation may be treated as the originanal execution of the Stipulation by that counsel/party.

Dated: November 2010

Panos Lagos, Esq. Attorney for Plaintiffs, FREDERICK JACKSON, et al.

EDRINGTON, SOHIRMER & MURPHY

Owen W. Roomey, Esq. Attorneys for Defendants, CITY OF PITTSBURG; et al.

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<u>ORDER</u>

IT IS HEREBY ORDERED that the November 15, 2010 deadline earlier-ordered by this Court be and hereby is extended to and including November 29, 2010 at Noon.

Dated: November 10, 2010.



HON. WILLIAM ALSUP UNITED STATES DISTRICT JUDGE

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